

U.S. Department of Labor
Occupational Safety and Health Administration

Violation Worksheet

Print Date: 09/30/2021

		Inspection Number		1521503	
		Opt. Insp. Number			
Establishment Name	Coastal Mechanical Systems, LLC				
DBA Name					
Type Of Violation	Serious	Citation Number	1	Item/Group	1
Standard	1915.89(g)(1)				
Alleged Violation Description	<p>29 CFR 1915.89(g)(1): Before servicing machinery, equipment, or a system that had a lockout/tags-plus system, the employer did not ensure that the authorized employee, or the primary authorized employee in a group lockout/tags-plus application, verified that the machinery, equipment, or system was deenergized and all energy sources isolated.</p> <p>On or about 03-15-2021 and times prior thereto, onboard the USS McFaul, DDG-74 located at General Dynamics - NASSCO Norfolk 200 Ligon Street, Norfolk, VA 23523: Employee(s) were exposed to pinch point and crushing hazards from a gas turbine engine blow-in door that was tagged out in the open position and not de-pressurized, de-energized, restrained, or isolated from all energy sources of power. No other verification of additional safety measures necessary to provide the equivalent safety available from the use of a lock were implemented. The employer provided project management and on-site supervision to subcontractor personnel exposed to caught-between hazards inside the gas turbine filter blow-in door panel.</p> <p>Abatement certification required within 10 days after abatement date. The certification shall include a statement that abatement is complete, date and method of abatement, and states employee(s) and their representatives were informed of this abatement.</p>				
Recommended Abatement Action					
# Instances	1	# Exposed	1		
Special Enforcement Type		Related Event Code (REC)	Referral, Temporary Workers, FAT/CAI/Accident		
General Duty Key Words		Employer's Relation to Hazard	Exposing		
Photo/Video Number		Substance Codes			

Penalty

Severity	High
Severity Justification	Serious permanent bodily injury and/or death.
Probability	Greater

Probability Justification	A contract employee was fatally crushed by the tagged-out blow-in door.		
Gravity	High	Size	30%
Gravity based Penalty	\$13,653.00	Good Faith	0%
# Times Repeated		History	0%
Multiplier		Quick Fix	0%
Calculated Penalty	\$9,557.00	Proposed Penalty	\$9,557.00
Proposed Penalty Justification			

Abatement Details

# Days to Abate	15 working days	Abatement Status	
Abatement Due Date	10/12/2021	Date Abated	
Abatement Documentation Required?	Yes	Date Verified	
Abatement Completed Description			

Multi-Step Abatement

Type/Other Type	# Days to Abate	Abatement Due Date	Completed (Status)	Verify Date
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Employee Exposure

Violation Instance	# Exposed to Instance	Employer	Name and Address Telephone Numbers	Duration	Frequency	Proximity
1	1	Blue Staffing Agency, LLC	Cynthia Gary 13 Lewis Dr. NEWPORT NEWS VA 23606 Home Phone: Personal Mobile:	30 Minute(s)	Once	In or near

Worksheet Details

A) Hazards-Operation/Condition-Accident: Employee was exposed to pinch point and crushing hazards from a gas turbine engine blow-in door that was tagged out in the open position and not de-pressurized, de-energized, restrained, or isolated from all energy sources of power. A fire watch employee was positioned on the exterior side of the blow-in door in preparation for hot work activities that was to occur inside the space on the opposite and interior (clean air) side of the blow-in door. The gas turbine blow-in door operating switch located multiple levels down in the vessel's main engine room was tagged-out in the open position. No other sources of energy were secured, including but not limited to, electrical, pneumatic, or kinetic energy.

B) Equipment: Gas turbine blow-in door panel set

C) Location: Onboard the USS McFaul - DDG-74 located at General Dynamics - NASSCO Norfolk 200 Ligon

Street, Norfolk, VA 23523

D) Injury/Illness (and Justifications for Severity and Probability): Permanent serious bodily injury and death. Employee was fatally crushed in the pinch-point area of the gas turbine blow-in door.

E) Measurements: Blow-in door measured 5', 9" wide; 2', 4.5" height; 2', 2" from bottom of door to piping height that crossed in front of blow-in door; 17" height from floor to bottom hinge of blow-in door. Door closing speed was measured by ships force to be 8 to 10 second.

F) Employer Knowledge: General Contractor, Coastal Mechanical Systems, LLC had onsite project managers and oversight. Coastal Mechanical supervision Keith Beamon and Brandon Hendrix instructed Harbor Industrial Services of which work tasks needed to be completed and assigned them to that space where the hazards existed. Coastal Mechanical was relying on the NAVY to tag out the system and did not verify behind the Navy since it had been approved by the Repair Activity. Coastal was aware that IIS was using temporary staffed employee(s) for fire watch activity. Coastal supervision, Keith Beamon advised that he was aware of the blow-in door hazard and it's open position because it was identified on the WAF. Harbor Industrial Services was aware of the US Navy ships force's control of the Lock Out/Tag Out process and never verified that the blow-in door system was isolated. (b) (7)(C) stated during an interview that she knew that door was hazardous from previous jobs and that the space was already inspected by Coastal Mechanical Systems and that she is not certified to verify if things are tagged out and it is not her responsibility. Supervisor (b) (7)(C) had positioned the victim at or near the space where the blow-in door opened and closed and left her there the wait for further instruction. Supervisor (b) (7)(C) admitted herself that she had physically peeked through the blow-in door opening to see inside the other space. Coastal Mechanical Systems, LLC Project Manager Assistant Keith Beamon provided oversight on location of the work processes and was aware of the tag/out procedures.

USS McFaul - DDG-74, Engineering ships force was responsible for and in control of lock out/ tag out program. All Work Authorization Form (WAF) requests were submitted, evaluated, assessed and approved by Ships force. The engineering duty officer received a WAF request from (b) (7)(C) WAF Coordinator of GD NAASCO to tag -out the blow-in doors in the "open" position. Work to be performed was the replacement of the blow-in door gaskets. (b) (7)(C) stated that this was rare and not a typical tag-out position for blow-in doors. (b) (7)(C) stated that "she owned those doors" (meaning it was her duties to control them) and she decided it was best to leave the air pressure on the system so the pneumatics would hold the door in the open position while work by contractors was being conducted. She decided to only tag-out the barrel switch in the open position that was located in the main passageway of the engine room.

Ships PMS card procedure dated June 2018 states that in order to make the Gas Turbine Generator Moisture Separator/Blow-In panels safe to:

- a. De-energize and/or isolate SSGTG and attach safety tag(s) in accordance with the Tag-out Users Manual (TUM) and/or local tag/out instruction(s).
- b. Isolate bleed air to affected gas turbine intake air anti-icing manifold and attach safety tag(s) in accordance with the Tag-out Users Manual (TUM) and/or local tag/out instruction(s).
- c. De-energize power to Moisture Separator/Blow-In panel heat trace and attach safety tag(s) in accordance with the Tag-out Users Manual (TUM) and/or local tag/out instruction(s).
- d. turn off L.R. vital air to blow-in panel solenoids and attach safety tag(s) in accordance with the Tag-out Users Manual (TUM) and/or local tag/out instruction(s).

This PMS card indicated these procedures and warnings for the process of inspecting the blow-in panel gaskets and linkages when operating around, in or near the blow-in door panels.

The TECHNICAL MANUAL FOR MOISTURE SEPARATOR/BLOW-IN PANEL SET S9234-GB-MMA-010 stated the following;

"Under no circumstances should the bypass opening of the blow-in moisture separators be used for access of personnel and/or equipment (cables, hoses, tools, etc.) to the downstream side of the panels. This will minimize damage to the gasket sealing surface and hinge mechanisms."

6-5.3 A sign depicting MAINTENANCE IN PROGRESS. DO NOT ADVANCE/START GAS TURBINE will be placed on the control panel of the appropriate gas turbine. A sign depicting MAINTENANCE IN PROGRESS. DO NOT OPERATE/APPLY POWER will be placed on the control panel of the appropriate panel set.

G) Comments:

H) Other Employer Information: